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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	§	
	§	Chapter 11
HIGHLAND CAPITAL MANAGEMENT,	§	
L.P.,	§	Case No. 19-34054-sgj11
	§	
Debtor.	§	

WITNESS AND EXHIBIT LIST

The Dugaboy Investment Trust, James Dondero, NexPoint Advisors, L.P. and Highland Capital Management Fund Advisors, L.P. (collectively, the “Objectors”) file this joint witness and exhibit list for the July 19 hearing to consider the *Debtor’s Motion for Entry of an Order (I) Authorizing the (A) Creation of an Indemnity Subtrust and (B) Entry into an Indemnity Trust Agreement and (II) Granting Related Relief* (the “Motion”) [Dkt. # 2491] filed by Highland Capital Management, L.P. (“Debtor”) and would show the Court as follows:

A. Documents that Objectors may use as exhibits:

Objectors Exhibit No.	Description	Offered	Objection	Admitted by Agreement	Admitted
A.	Fifth Amended Plan of Reorganization (As Modified) [Docket No. 1808]				
B.	Disclosure Statement for Fifth Amended Plan [Docket No. 1473]				
C.	Order Approving Disclosure Statement [Docket No. 1476]				
D.	Debtor’s Notice of Filing of Supplement to the Third Amended Plan of Reorganization [Docket No. 1389], including all attachments/exhibits				
E.	Debtor’s Notice of Filing of Supplement to the Fifth Amended Plan of Reorganization [Docket No. 1606] (Second Supplement), including all attachments/exhibits				
F.	Debtor’s Notice of Filing of Supplement to the Fifth Amended Plan of Reorganization [Docket No.				

	1656] (Third Supplement), including all attachments/exhibits				
G.	Debtor's Notice of Filing of Supplement to the Fifth Amended Plan of Reorganization [Docket No. 1811] (Fourth Supplement), including all attachments/exhibits				
H.	Debtor's Notice of Filing of Supplement to the Fifth Amended Plan of Reorganization [Docket No. 1875] (Certain Amendments), including all attachments/exhibits				
I.	Order Confirming Fifth Amended Plan of Reorganization [Docket No. 1943]				
J.	Term Sheet for Indemnity Trust Agreement [Docket No. 2491-2]				
K.	Debtor's Motion to Obtain Exit Financing [Docket No. 2229]				
L.	Debtor's Notice of Final Term Sheet regarding Exit Financing [Docket No. 2455]				
M.	Transcript of hearing held on February 2, 2021				
N.	Transcript of hearing held on February 3, 2021				
O.	Transcript of hearing held on February 8, 2021				
	Any transcript of any hearing in the above-captioned bankruptcy case				
	Any document or pleading filed in the above-captioned bankruptcy case				
	Any exhibit necessary for impeachment or rebuttal purposes				

	Any and all documents identified or offered by any other party				
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Objectors reserve the right to amend and/or supplement this Exhibit List should they determine that any other document may be helpful to the trier of fact, whether in their case in chief or rebuttal.

B. Witnesses that Objectors may call to testify:

1. James P. Seery, Jr.;
2. Any and all other witnesses identified or called by any other party; and
3. Any witness necessary for rebuttal.

Objectors reserve the right to amend and/or supplement this Witness List should they determine that any other witness may be helpful to the trier of fact, whether in their case in chief or rebuttal.

Dated: July 16, 2021

Respectfully submitted,

/s/Douglas S. Draper.

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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on July 16, 2021, a true and correct copy of the foregoing document was served by the Court's CM/ECF system on counsel for the Debtor and on all other parties requesting such service in this case.

/s/ Bryan C. Assink

Bryan C. Assink